

Cayla Witty
Nevada State Bar. No. 12897
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas, NV 89118
Telephone: 702-693-4392
Email: Cayla.Witty@lewisbrisbois.com

William M. Gantz (*Admitted pursuant to LR IA 11-2*)
David R. Metzger (*Admitted pursuant to LR IA 11-2*)
DENTONS US LLP
233 South Wacker Drive, Suite 5900
Chicago, IL 60606-6361
Telephone: 312-876-8000
Email: bill.gantz@dentons.com
Email: david.metzger@dentons.com

Attorneys for Defendant 888 Holdings PLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CG TECHNOLOGY DEVELOPMENT, LLC,
INTERACTIVE GAMES LIMITED, and
INTERACTIVE GAMES LLC

Plaintiffs,

v.

888 HOLDINGS PLC,

Defendant.

Case No. 2:16-cv-00801-RCJ-VCF
Case No. 2:16-cv-00856-RCJ-VCF
(Consolidated)

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
INITIAL DISCLOSURES UNDER
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER, ECF 80**

(First Request)

Plaintiffs CG Technology Development, LLC (“CG Tech”), Interactive Games Limited (“IG Limited”), and Interactive Games LLC (“IG LLC”) (collectively “Plaintiffs”), and Defendant 888 Holdings PLC (“Defendant”), by and through their undersigned counsel, hereby agree to extend the period for production of initial disclosures pursuant to FRCP 26.1 for a period of three (3) days, up to and including December 23, 2016. In support of this Stipulation and request, the parties state as follows:

///

///

///

DISCOVERY PLANNED

1. Plaintiffs filed their First Amended Complaint for Patent Infringement on July 11, 2016 (ECF No. 19).
2. On August 12, 2016, Defendant filed a Motion to Dismiss all counts of the First Amended Complaint under Fed. R. Civ. P 12(b)(6) (ECF No. 23).
3. On December 6, 2016, this Court entered in part and denied in part Defendant's motion. (CG Technology Development, LLC et al. v. 888 Holdings PLC, 2:16-cv-00856-RCJ-VCF, ECF No. 54).
4. On December 9, 2016, the parties entered a Proposed Discovery Plan and Scheduling Order, ECF 80. Pursuant to this filing, the parties were to exchange initial disclosures on December 20, 2016.

REASONS FOR EXTENSION

Defendant 888 Holdings LPC must coordinate with individuals outside the United States to provide the information required for initial disclosures under the rules. Defendant has been diligent in coordinating with these individuals, but is restricted by religious observance and the differing time zones.

~~PROPOSED~~ SCHEDULE FOR DISCOVERY

The following is a list of the single discovery-related dates and proposed extension:

Scheduled Event	Current Deadline	Proposed Deadline
Initial Disclosures	December 20, 2016	December 23, 2016

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs modifications or extension of a discovery plan and scheduling order. Any stipulation or motion must be made no later than twenty-one (21) days before the expiration of the subject deadline, and a request made within 21 days of the subject deadline must be supported by a showing of good cause. Any stipulation or motion for an extension of the discovery plan and scheduling order must comply fully with LR 26-4.

The parties are requesting an extension of the discovery deadline within the twenty-one (21) day period as set forth in LR 26-4. As such, the parties submit that good cause exists to permit granting the instant requested extension. The Scheduling Order has not yet been entered in this matter, and the date for initial disclosures will only be extend by three days. Moreover, the parties continue to cooperate on all other discovery related matters and pursue the remaining deadlines as set forth in ECF 80. The parties are acting in good faith to complete discovery. Further, this extension request is made in good faith, jointly by the parties, and not for the purposes of delay. Trial in this matter has not yet been set. Moreover, since this request is a joint request, and both parties will be allowed the three day extension, neither party will be prejudiced.

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension. Nothing contained herein shall be deemed an admission or waiver of any right belonging to any party hereto.

///

///

///

///

///

///

///

///

///

///

///

///

///

WHEREFORE, the parties respectfully request that this Court extend the period to exchange initial disclosures by three days (3) from the current deadline of December 20, 2016 up to and including December 23, 2016.

IT IS SO STIPULATED:

DATED this 19th day of December 2016.

/s/ Cayla Witty

Cayla Witty
Nevada Bar. No. 12897
LEWIS BRISBOIS BISGAARD & SMITH
LLP
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118
Telephone: 702-693-4392
Cayla.witty@lewisbrisbois.com

William M. Gantz (*pursuant to LR IA 11-2*)
David R. Metzger (*pursuant to LR IA 11-2*)
DENTONS US LLP
233 South Wacker Drive, Suite 5900
Chicago, IL 60606-6361
Telephone: 312-876-8000
bill.gantz@dentons.com
david.metzger@dentons.com

Attorney for Defendant 888 Holdings PLC

DATED this 19th day of December 2016.

/s/ Erica J. Chee

Molly M. Rezac
Nevada Bar No. 7435
Erica J. Chee
Nevada Bar No. 12238
OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.
3800 Howard Hughes Parkway, Suite 1500
Las Vegas, NV 89169

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
Robert F. Shaffer (*Admitted Pro Hac Vice*)
James R. Barney (*Admitted Pro Hac Vice*)
Anthony D. Del Monaco (*Admitted Pro Hac Vice*)
901 New York Avenue, NW
Washington, DC 20001-4413
Telephone: 202-408-4000

*Attorneys for Plaintiffs CG Technology
Development, LLC; Interactive Games Limited;
and Interactive Games LLC*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED this 21st day of December, 2016.